



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 23, 2023

BY ECF

Hon. Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 443
New York, NY 10007

Re: *United States v. Wahab*, S7 21 Cr. 603 (VEC)

Dear Judge Caproni:

The Government writes further to the status reports regarding the Government's production of discovery in the above-captioned matters.

By way of background, on July 3, 2022, the Government noted that while production of discovery materials was largely complete, FBI's CART team would continue efforts to bypass the security features in two of the cellphones seized from defendant Terrence Williams. Recently, CART's efforts to bypass the security features of Williams's devices have proved successful.

On or about December 30, 2022, CART made available to the FBI case agents an extraction of a cellphone seized from Williams's garage on October 7, 2021. That extraction appears to be from a cellphone which was wiped of its data sometime before the seizure of the device. It therefore has limited content including the device information. The Government will produce any responsive material from that device and expects to complete such production next week.

On or about January 18, 2023, CART made available to the FBI case agents an extraction of a cellphone seized from a table near where Williams was arrested. Preliminary review of this device indicates it has approximately 60 gigabytes of data, which is being reviewed. The data appears to contain content information including text messages (some with the remaining defendants), photographs, contacts, call records, emails and other materials. The Government will produce information from this device within in the next two to four weeks.

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The Government will continue to produce on a rolling basis the materials it acquires, which are relevant to the defendants.

The Government is available to address any questions the Court may have.

Respectfully submitted,

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